

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CRAIG SANFORD,)	
MARY JO SANFORD,)	
)	
Plaintiffs,)	
)	
v.)	
)	
SCG INTERNATIONAL, LLC,)	C. A. No. 1:10cv940 GBL/IDD
)	
and)	
)	
JAMES F. SMITH, JR.,)	
)	
Defendants.)	

**DEFENDANTS' RENEWED RULE 50(b)
MOTION FOR JUDGMENT AS A MATTER OF LAW**

Defendants SCG International, LLC and James F. Smith, Jr. respectfully renew their Motion for Judgment as a Matter of Law under Federal Rule of Civil Procedure 50(b). The undisputed evidence at trial failed to support Plaintiffs' allegations in their Amended Complaint. Thus, judgment as a matter of law is appropriate. For the reasons stated herein and in the accompanying memorandum of law, Defendants ask the Court to enter judgment in their favor on Plaintiffs' fraud claim as a matter of law. In the alternative, Defendants ask for a new trial under Federal Rule of Civil Procedure 59(a).

Dated: September 8, 2011

Respectfully submitted,

SCG INTERNATIONAL, LLC
JAMES F. SMITH, JR.

/s/ Brent L. VanNorman

Brent L. VanNorman (VSB #45956)

HUNTON & WILLIAMS LLP

500 East Main Street, Suite 1000

Norfolk, Virginia 23510

Telephone: (757) 640-5343

Facsimile: (757) 625-7720

bvannorman@hunton.com

*Counsel for SCG International, LLC &
James F. Smith, Jr.*

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of September, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record:

J. Chapman Petersen (VSB #37225)
Jason Zellman (VSB #77499)
SUROVELL ISAACS PETERSEN & LEVY PLC
4010 University Drive, Suite 200
Fairfax, Virginia 22030
Telephone: (703) 251-5400
Facsimile: (703) 591-9285
jpetersen@smillaw.com
jzellman@smillaw.com

Counsel for Plaintiffs

/s/ Brent L. VanNorman
Brent L. VanNorman (VSB #45956)
HUNTON & WILLIAMS LLP
500 East Main Street, Suite 1000
Norfolk, Virginia 23510
Telephone: (757) 640-5343
Facsimile: (757) 625-7720
bvannorman@hunton.com

Counsel for Defendants
SCG International, LLC and
James F. Smith, Jr.